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CHEMICAL MANUFACTURERS ASSOCIATION

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Langley A. Spurlock, Ph.D., CAE
Vice President, CHEMSTAR

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United States Environmental Protection Agency
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Attention: 8(e) Coordinator

Dear Sir or Madam:

The information below is being submitted to the U.S. Environmental Protection Agency in accordance with the EPA's interpretation of Section 8(e) of the Toxic Substances Control Act. The letter is submitted on behalf of the following producers of ethyl acetate: BASF Corporation, BP Chemicals, Inc., Eastman Chemical Company, Rhone-Poulenc Inc., Hoechst Celanese Corporation, and Monsanto Company. While we do not feel that this information constitutes a substantial risk, the present submission is intended to discharge any 8(e) responsibilities that might exist and thus should be processed in accordance with the EPA's "substantial risk" procedures.

The following information arises from observations made during a 10-day vapor inhalation study with ethyl acetate (CASNR 141-78-6) in the rat:

1. A statistically significant reduction in total motor activity session counts was noted during the second week of exposure in female rats exposed to 6000 ppm ethyl acetate.

2. A Functional Observational Battery Test suggested that males and females exposed to 3000 or to 6000 ppm ethyl acetate may have experienced deficits in general coordination (*i.e.*, gait and unusual behavior) and pupil size, although the small sample size precludes a definitive conclusion.

3. Labored or rapid breathing during nonexposure periods on Day 2 was observed in several animals exposed to 6000 ppm.

4. Alterations in organ weights (absolute, relative to body weight, and relative to brain weight) were observed in groups of animals exposed to 1500, 3000, or 6000 ppm ethyl acetate. No gross lesions related to ethyl acetate exposure were observed in any of the groups.

The 10-day study was conducted as a probe study to determine doses for a 90-day subchronic study that will be conducted as part of a TSCA Section 4 testing program. The effects described above were observed in the presence of other systemic toxicity (*e.g.*, decreased food consumption, increased water consumption, decreased rate of weight gain, and decreased body weights). This information should be considered preliminary. A final report on the 10-day study is being prepared and will be submitted to the Agency when it becomes available.

If you have any questions regarding this letter, please contact Barbara O. Francis of my staff at 202/887-1314.

Sincerely,

Langley A. Spurlock, Ph.D., CAE
Vice President, CHEMSTAR

cc: BASF Corporation
BP Chemicals, Inc.
Eastman Chemical Company
Rhone-Poulenc Inc.
Hoechst Celanese Corporation
Monsanto Company